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2 Magistrate Judge Wilson
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CLERK U.S. DISTRICT COURT
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9 UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

10 UNITED STATES OF AMERICA, } MAGISTRATE'S DOCKET NO.
Plaintiff, } CASE NO. 99-547M
11 v. } COMPLAINT FOR VIOLATION
AHMED RESSAM, } U.S.C. Title 18, Sections 842(a)(3)(A)
Defendant. } and 1001

12
13 BEFORE David E. Wilson, United States Magistrate Judge
United States Courthouse, 1010 Fifth Avenue, Seattle, Washington.

14
15 The undersigned complainant being duly sworn states:
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17 COUNT I

18 On or about December 14, 1999, at Port Angeles, within the Western District of
19 Washington, AHMED RESSAM, not being a licensee or permittee under the provisions of
20 Chapter 40 of Title 18, of the United States Code, knowingly transported and shipped, and
21 caused to be transported and shipped, in interstate and foreign commerce, from Canada into
22 the United States, explosive materials, that is, nitroglycerine.

23 All in violation of Title 18, United States Code, Sections 842(a)(3)(A); and 844(a).

24 COUNT II

25 On or about the December 14, 1999, at Port Angeles, within the Western District of
26 Washington, in a matter within the jurisdiction of the United States Customs Service, an
27 agency of the United States, AHMED RESSAM, did knowingly and willfully make a false,

1 fraudulent, and fictitious material statement and representation; in that the defendant
2 presented to U.S. Customs Inspectors a Customs Declarations Form #6059B identifying
3 himself as Benni Antoine Noris (date of birth: May 9, 1971), whereas in truth and fact, as he
4 then well knew, these statements were false in that his true name is AHMED RESSAM (date
5 of birth: May 9, 1967).

6 All in violation of Title 18, United States Code, Section 1001.

7 And the complainant states that the following:

8 1. I, Michael J. Calonita, am a Senior Special Agent with the United States
9 Customs Service, Resident Agent in Charge, Blaine, Washington, and have been so
10 employed for approximately twelve years. The following information is based on my own
11 investigation, as well as information obtained and provided to me by other officers of the
12 United States Customs Service, Royal Canadian Mounted Police and Washington State
13 Patrol.

14 2. On December 14, 1999, at approximately 6:00 p.m., an individual identifying
15 himself as "Benni Antoine Noris" entered the United States at Port Angeles, Washington, on
16 the ferryboat "Coho" from Victoria, British Columbia, Canada. Noris was driving a Chrysler
17 300, British Columbia license plate number ANF304, which he rented in Vancouver, BC.
18 Noris' vehicle was the last car off the ferry. U.S. Customs Inspectors performed a secondary
19 Customs examination of the car and requested that Noris get out of the vehicle, but initially he
20 was uncooperative.

21 3. Benni Antoine Noris filled out a CF 6059B Customs Baggage Declaration Form
22 which he presented to U.S. Customs Inspector Diana Dean. The form listed his name as
23 Benni Noris with a date of birth of May 9, 1971. In addition, Noris presented a Costco card
24 with the name of Benni Noris and his photograph to another U.S. Customs Inspector.
25 Customs Inspectors later discovered in the vehicle a Canadian Passport #VE537438, in the
26 name of Benni Antoine Noris, date of birth May 9, 1971; a Quebec driver's license
27 #PCC305CUW in the name of Benni Antoine Noris; a Quebec driver's license #NKDE71K08
28 in the name of Mario Roig, Date of Birth May 9, 1971. Additionally, U.S. Customs Inspectors

1 discovered at least eight (8) credit cards in the name of Benni Noris.

2 4. U.S. Customs Inspectors began to search the trunk of Noris' vehicle. The
3 Inspectors lifted up a mat to inspect the spare tire well. The well did not have a spare tire.
4 Instead, the Inspectors discovered concealed in the spare tire well the following: 10 plastic
5 bags which contained approximately 118 pounds of a fine white powder; 2 plastic bags which
6 contained about 14 pounds of a crystalline powder; two 22 ounce jars each filled
7 approximately 3 quarters full with a yellowish liquid; and 4 small black boxes which each
8 contained a circuit board connected to a Casio watch and 9 volt battery connector.

9 5. One of the U.S. Customs Inspectors began to escort Noris back from the car.
10 Noris physically broke free from the Inspector and tried to flee from the area. Inspectors
11 chased Noris for approximately 5 to 6 blocks. At the intersection of Lincoln and First Street
12 Inspectors observed Noris run up to a car that had slowed in the intersection. Noris attempted
13 to open the driver's door. The driver, a woman, was able to lock the door and speed away.
14 Noris was then tackled in the street by the Inspectors and taken into custody.

15 6. A test by the Washington State Patrol Laboratory in Tacoma, Washington,
16 determined that the yellowish liquid is nitroglycerine and that the substance is extremely
17 volatile and explosive. The crystalline white powder is a form of sulfate whose main use is as
18 a desiccant to absorb water and keep things dry. The 118 pounds of fine white powder is
19 urea, which is used to manufacture explosives and fertilizer. Preliminary analysis disclosed
20 that when these materials are combined with a detonator, it would produce a large explosive
21 device.

22 7. According to Special Agent Jesse Chester of the Bureau of Alcohol, Tobacco
23 and Firearms, a NEXUS computer check revealed that AHMED RESSAM is not a licensee or
24 permittee under the provisions of Chapter 40 of Title 18, of the United States Code permitted
25 to transport, ship, or receive in interstate or foreign commerce any explosive materials.

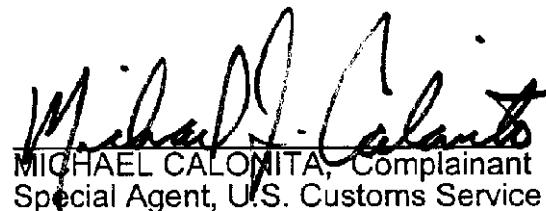
26 8. Investigation by U.S. Customs agents resulted in the discovery that Noris made
27 a reservation at the Best Western Loyal Inn in Seattle, Washington, for December 14, 1999,
28 for one night in the name of Benni Noris. The rental car, British Columbia license ABF304,

1 was due to be turned in at the Seatac International Airport on December 15, 1999. A search
2 of airline records at the Seatac International Airport disclosed that a "Benni Norris" had a
3 reservation for December 15, 1999, on American Airlines flight #408 from Seattle to New York
4 through Chicago, connecting to British Airways flight #116 from New York to London.

5 9. At my request, Benni Antoine Noris was arrested by the U.S. Border Patrol in
6 Port Angeles on charges of Misrepresentation on Entry and Failure to be Inspected, and was
7 booked into Clallam County Jail.

8 10. On December 16, 1999, the Royal Canadian Mounted Police assisting in this
9 investigation advised that the driver's license in the name of Mario Roig is false and does not
10 exist. Fingerprints obtained from Benni Antoine Noris at the time of his arrest were analyzed
11 by the Royal Canadian Mounted Police and were determined to belong to AHMED RESSAM,
12 Date of Birth May 9, 1967, who was born in Algeria. AHMED RESSAM has a Canadian
13 criminal history for Theft Under \$5,000; a Canada-Wide Immigration Arrest Warrant; and a
14 British Columbia-Wide Arrest Warrant for Theft Under \$5,000.

15 11. Based on the foregoing, I submit that probable cause exists to believe that
16 AHMED RESSAM, a/k/a Benni Antoine Noris committed violations of Title 18, United States
17 Code, Section 1001 (False Statements); and Title 18, United States Code, Section 842
18 (Transporting Explosives).

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MICHAEL CALOMITA, Complainant
Special Agent, U.S. Customs Service

22 Complaint and affidavit sworn to before me this 17th day of December 1999.
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DAVID E. WILSON
United States Magistrate Judge